

SQUIRE PATTON BOGGS (US) LLP
John R. Gall (Admitted N.D. Cal., Ohio Bar # 0011813)
Mark C. Dosker (CA Bar #114789)
Joseph P. Grasser (CA Bar #255156)
Tania L. Rice (CA Bar # 294387)
275 Battery Street, Suite 2600
San Francisco, California 94111
Telephone: (415) 954-0200
Facsimile: (415) 393-9887
E-Mail: john.gall@squirepb.com
mark.dosker@squirepb.com
joseph.grasser@squirepb.com
tania.rice@squirepb.com

Attorneys for Defendants
NONGSHIM CO., LTD. and
NONGSHIM AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE KOREAN RAMEN ANTITRUST
LITIGATION,

Case No. 3:13-cv-04115-WHO

**DECLARATION OF BYUNG CHUL
PARK IN SUPPORT OF NONGSHIM
CO., LTD.'S AND NONGSHIM
AMERICA, INC.'S BILL OF COSTS**

THIS DOCUMENT RELATES TO:

Date: April 10, 2019
Time: 2:00 p.m.
Courtroom: 2, 17th Floor

All Actions

1 I, Byung Chul Park, declare as follows,

2 1. I am the Deputy Senior Manager of the Legal Affairs Team of Nongshim Co., Ltd.
3 I work in Nongshim Co., Ltd.'s office in Seoul, Korea, which is also where I reside. I testified at
4 the trial in this action, which required me to travel from Korea to San Francisco, California. I also
5 helped arrange for the travel of Bo Gyoo Kim and Hak Sung Kim, who are also employees of
6 Nongshim Co., Ltd. in Korea, and who also testified at trial. I have personal knowledge of the
7 facts herein and if called to testify, I could and would testify hereto. I read English sufficiently to
8 give this Declaration in English, without translation into the Korean language.

9 2. My flight from Seoul, Korea to San Francisco cost KRW1,502,900, which is equal
10 to \$1353.96 in U.S. dollars (based on an exchange rate of 1110:1, as of December 3, 2018,
11 obtained at
12 [https://www.reuters.com/finance/currencies/quote?destAmt=&srcAmt=1.00&srcCurr=USD&dest](https://www.reuters.com/finance/currencies/quote?destAmt=&srcAmt=1.00&srcCurr=USD&destCurr=KRW)
13 [Curr=KRW](https://www.reuters.com/finance/currencies/quote?destAmt=&srcAmt=1.00&srcCurr=USD&destCurr=KRW)). In San Francisco, I stayed at the CQ Hotel for 10 nights. My hotel cost a total of
14 \$2139.31 (KRW2,133,765 plus \$217 in amenities charges) for those 10 nights, or \$213.93 per
15 night. However, Nongshim Co., Ltd. only seeks to recover the cost of 3 nights, for the nights of
16 December 1, 2, and 3, which equals \$641.79. I testified in Court on December 3, 2018. When
17 returning home, I took an Uber ride from the CQ Hotel to the San Francisco International Airport,
18 which cost \$31.85.

19 3. The flight for Bo Gyoo Kim from Seoul, Korea where he resides to San Francisco
20 cost KRW6,524,500, which is equal to \$5,835.87 in U.S. dollars (based on an exchange rate of
21 1118:1, as of November 29, 2018, obtained at the same website listed above). In San Francisco,
22 he stayed at the CQ Hotel for 6 nights. His hotel stay cost a total of \$1382.82 (KRW1,402,388
23 plus \$128.45 in amenities charges) for those 6 nights, or \$230.47 per night. Nongshim Co., Ltd.
24 only seeks to recover for the cost of 3 nights, for the nights of November 27, 28, and 29, which
25 equals \$691.41. Mr. Kim testified in Court on November 29, 2018.

26 4. The flight for Hak Sung Kim from Seoul, Korea where he resides to San Francisco
27 cost KRW6,524,500, which is equal to \$5,825.45 in U.S. dollars (based on an exchange rate of
28 1120:1, as of November 30, 2018, obtained from the same website listed above). In San

1 Francisco, he stayed at the CQ Hotel for 7 nights. His hotel stay cost a total of \$1614.97
2 (KRW1,642,554 plus \$148.40 in amenities charges) for those 7 nights, or \$230.71 per night.
3 Nongshim Co., Ltd. only seeks to recover for the cost of 3 nights, for the nights of November 28,
4 29, and 30, which equals \$692.13. He testified in Court on November 30, 2018. When returning
5 home, he took an Uber ride from the CQ Hotel to the San Francisco International Airport, which
6 cost \$35.53.

7 5. The reason we each needed to stay in San Francisco for more than one night was
8 that it was not certain which day we would each be testifying, and flights to and from Korea were
9 only available at certain times.

10 6. True and correct copies of the receipts for the above travel expenses are attached
11 hereto as **Exhibit F**.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct. Executed on February 14, 2019, at Seoul, Korea.

14 

15 _____
Byung Chul Park